Applicant: Kressner et al Attorney's Docket No.: 02894-0669US1 / 06629

Serial No. : 10/501,851 Filed : October 25, 2004

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## **REMARKS**

Claims 1-9 and 11-30 are pending in the application. No further amendments are advanced at this time.

Claims 1-30 stand rejected under 35 U.S.C. §102(b) as anticipated by U.S. Pat. No. 5,732,433 to Göcking et al. ("Göcking"). This rejection is respectfully traversed.

As noted in Applicants' previous response, claim 10 has been cancelled without prejudice or disclaimer. Consequently, the new rejection of claim 10 is moot.

With respect to claims 1-9, 11-20 and 22-30, Applicants note that independent claim 1 recites first and second bristle support segments that both rotate about a common (first) axis, but that are also movable relative to one another, and that the second bristle support segment also swivels about a different (second) axis.

The rejection refers to Göcking's bristle supports 101 and 38, which are shown in Fig. 2, and says that "two different perpendicular axis are shown." It is presumed that this refers to the fact that bristle support 38 appears to rotate about an axis parallel to its bristles, while bristle support 101 appears to rotate about the drive shaft, which is essentially perpendicular to the rotational axis for support 38 (cf., Göcking, col. 4, lines 18-30 and 56-65). Such motion, however, does not meet the limitation of rejected claim 1 that both the first and second bristle support segments rotate about a first (i.e., a common) axis.

Similarly, independent claim 21 recites "a first support segment that *rotates about a first axis*, and a second support segment that *rotates about the first axis* and that selectively swivels about a second axis" (emphasis added). Such limitation is not met by the structure disclosed in Göcking.

For at least these reasons, Applicants submit that all of the pending claims are novel over Göcking and request that this rejection be reconsidered and withdrawn.

Applicants are filing a further Information Disclosure Statement herewith, to identify references associated with the prosecution of an earlier, co-owned but unrelated patent application that issued as U.S. Patent No. 7,392,562. Although the undersigned attorney was also involved in the prosecution of the earlier application, only recently was the similarity between certain structural features noted. Should any of these references raise any questions of

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patentability of the pending claims, the undersigned attorney respectfully requests a telephone discussion to advance prosecution, given the extended prosecution history to date.

It is believed that all of the pending claims have been addressed. However, because the arguments made above may not be exhaustive, there may be reason for patentability of any or all pending claims (or other claims) that have not been expressed. Applicants respectfully request consideration of all filed IDS' not previously considered, by initialing and returning each Form 1449.

No charges are believed due. However, if any fees are due, they are being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply all charges or credits to Deposit Account No. 06-1050, referencing Attorney Docket No. 02894-0669US1.

Respectfully submitted,

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